

# **EXHIBIT 3**

## JOANNA CUEVAS INGRAM, ESQ.

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### BAR ADMISSION AND AFFILIATIONS

*California: Admitted June 2013; New York: Admitted August 2015*

*U.S. Courts: S.D.N.Y. & E.D.N.Y.: Admitted September 2015*

American Bar Association (ABA); California State Bar Association; New York State Bar Association (NYSBA); New York City Bar Association (NYCBA); 2014 Board Member, California Common Cause; 2014-2017 Civil Rights Committee Member, NYCBA

### EDUCATION

J.D. University of California, Davis School of Law - May 2012  
*Certificates* Public Service; Pro Bono Service  
*Journal* Editor-in-Chief, *University of California, Davis Journal of International Law & Policy*  
*Leadership* Faculty Appointments Student Representative, *Law Students Association*  
Recruitment and Retention Committee, *King Hall Coalition for Diversity*  
*Advocacy* First Place, 2010 ABA Intraschool Negotiations Competition, U.C. Davis School of Law  
Third Place, 2010 National Latino Law Students Association Moot Court Competition, Yale Law School

B.A. Occidental College - Art History and the Visual Arts: Film Production - May 2004

### PUBLICATIONS

*Chapter 13: Redistricting and Court Review of Electoral District Boundaries* (May 8, 2017), pp. 423-60 in PLI'S LITIGATION AND ADMINISTRATIVE PRACTICE COURSE HANDBOOK SERIES: REDISTRICTING AND VOTING 2017: THE LEGAL LANDSCAPE (CLE PUBLICATION), (Published, August 04, 2017); *Chapter 14: Legal Overview & History of Racial Gerrymandering Cases in the U.S. (CLE PowerPoint slides)* pp. 461-520 in PLI's REDISTRICTING AND VOTING 2017: THE LEGAL LANDSCAPE, PRACTISING LAW INSTITUTE (PLI) (Published, Aug. 4, 2017)

*Sanctuary, Safety & Community: Tools for Welcoming and Protecting Immigrants Through Local Democracy*, LATINOJUSTICE PRLDEF & DEMOS JOINT REPORT PUBLICATION (with Kathy Culliton-Gonzalez, Senior Counsel, Demos) (available in English and Spanish) (January 2017)

*Verifying Democracy: Developments in Voter ID and Citizenship Verification Practices CLE*, AMERICAN BAR ASSOCIATION (ABA) (with Juan Cartagena, President and General Counsel, LatinoJustice PRLDEF) (Jun. 23, 2016)

*Pregnancy Discrimination, Immigrant Women and Low-Wage Work*, HUFFINGTON POST (with Natasha Lycia Ora Bannan, Associate Counsel, LatinoJustice PRLDEF) (Jun. 9, 2015)

*La Ley de Cuidado de Salud Asequible y los Derechos al Voto: Una Buena Cura Para El Futuro de Nuestra Democracia*, HUFFINGTON POST VOCES (Dec. 8, 2014)

*Voting Rights Barriers and Discrimination in Twenty-First Century California Elections: 2000-2013*, LCCR REPORT PUBLICATION (March 2014) (with Rachel Evans, Georgetown Law Fellow)

*Holder's voting remarks hit home* (Print); *Holder's call for repeal of ex-convict voting laws hits home* (Online), DAILY JOURNAL: CALIFORNIA'S LARGEST LEGAL NEWS PROVIDER, Vol. 120, No. 31 (Feb. 14, 2014)

*Anatomy of a Modern Day Lynching: The Relationship Between Hate Crimes Against Latina/os and The Debate Over Immigration Reform*, 91 N.C. L. REV. 1613 (2013) (with Kevin R. Johnson, Dean, U.C. Davis School of Law)

*The Color of Change: Voting Rights in the 21<sup>st</sup> Century and the California Voting Rights Act*, 15 HARV. LATINO L. REV. 183 (2012)

### LEGAL EXPERIENCE

Associate Counsel, *LatinoJustice PRLDEF*, New York, NY

Sept. 2014 – Jan. 2018

Under direct supervision of the Deputy General Counsel, led primary research, development, implementation & evaluation of federal constitutional, civil rights and voting rights litigation in federal court. Independently, and with fellow LJP Attorneys and/or pro bono co-counsel: interviewed potential clients & developed new litigation; prepared retention letters; conducted legal research and case management; maintained client relationships; engaged in federal case discovery, including written discovery, defended and deposed 30(b)(1) witnesses; deposed 30(b)(6) witnesses, ensured compliance

with procedural obligations and deadlines; drafted legal pleadings, memoranda, motions, amici briefs and other court filings for submission in federal civil rights cases; prepared clients for testimony; prepared legal reports and publications; interfaced with press/media; supervised Fellows/Interns, served as CLE Faculty on voting rights and constitutional rights matters for the Practising Law Institute (PLI), American Bar Association (ABA), and for law firms; developed and led 2016 *Cada Voto Cuenta* bilingual nonpartisan voter protection project, including the negotiation of a contract and development of content for LJP's *Cada Voto Cuenta* Nonpartisan Voter Protection Smartphone Application; recruited and trained over 300 bilingual pro bono attorneys and legal volunteers; provided 17 critical free or low-cost 2-hour LJP *Cada Voto Cuenta* CLE-credit eligible trainings and webinars on State and Federal Voting Rights and Election Laws, hosted by several firms, including Squire Patton Boggs in New York, NY; Dechert LLP in Charlotte, NC; Kilpatrick Townsend, LLP in Atlanta, GA; Morgan Lewis LLP in Miami, FLA; and Duane Morris, LLP in Philadelphia, PA.

Under direct supervision of the Deputy General Counsel, led primary research, development, implementation and evaluation of federal civil rights and voting rights strategies to achieve litigation goals in emerging areas of community interest and cases pending in federal court, including bringing three voting rights cases in federal court with co-counsel; securing a Consent Decree with Co-Counsel at Lawyers' Committee for Civil Rights, Dechert LLP and the New York Attorney General's Office, together with the U.S. Department of Justice, Civil Rights Division (Voting Section), to ensure NYC Board of Elections compliance with the National Voter Registration Act of 1993 (NVRA), through Election Year 2020; and litigating two major precedential 42 U.S.C. 1983 actions.

Independently, and with fellow LatinoJustice Attorneys and external pro bono co-counsel: interviewed potential clients and develop new litigation matters; prepared retention letters; conducted legal research; case management; maintained client relationships; engaged in federal case discovery, including written discovery, defended and deposed 30(b)(1) and 30(b)(6) witnesses, including Commanding Officers and high level Inspectors of the Internal Affairs Bureau of a major County Police Department in federal 42 U.S.C. Section 1983 civil and constitutional rights impact cases, ensured compliance with procedural obligations and deadlines; drafted legal pleadings, memoranda, motions and other court filings for submission in federal civil rights cases pending at the trial court and appellate level; prepared clients for testimony; performed direct and cross examination of witnesses; supervised interns and postgraduate Legal Fellows in the performance of all of the above or related tasks; developed and facilitated continuing legal education courses, academic lectures, educational presentations and Know Your Rights workshops for partner legal and community organizations; drafted, developed and reviewed grant applications and reports related to Associate Counsel work, including voting rights and the Latinas @ Work (LAW) Project, advancing the civil rights of low-wage Latina workers in New York City.

Led nonpartisan legislative and administrative advocacy, including preparing testimony and public comment; appeared on legal panels in a variety of educational and community settings; served as a media spokesperson representing the organization and as a liaison to the community.

Equal Justice Works Voting Rights Fellow, *Lawyers' Committee for Civil Rights of the San Francisco Bay Area (LCCR)*, *San Francisco, CA*—Led primary research, development, implementation and evaluation of state and federal voting rights impact litigation; scholarly clarification of voting rights law; civic engagement; and continuing legal education (CLE) workshops on voting rights throughout California. Drafted original complaint, interviewed plaintiffs, conducted legal research and edited briefing in state voting rights suit filed with co-counsel at ACLU of Northern California, *Scott et al. v. Bowen*, RG14712570 (Alameda Super. Ct. filed Feb. 4, 2014, order granting petitioners' request for writ of mandate relief granted May 7, 2014), affirming the voting rights of an estimated 60,000 Californians on mandatory supervision and post-release community supervision (PRCS) under California's Criminal Justice Realignment and voting rights laws. Contributed legal research and analysis for two successful California Voting Rights Act (CVRA) case settlements; researched and developed CVRA claim that led a California water district to seek a vote to transform its electoral system in order to comply voluntarily, and conducted significant CVRA investigations in over nine jurisdictions throughout the state.

Sept. 2012-Aug. 2014

Coordinated CLE / *pro bono* program, training 90+ private bar attorneys on state and federal voting rights law to enforce voting rights protections in California prior to the November 2012 Elections. Worked together with Asian Americans Advancing Justice-Asian Law Caucus in 2013 to ensure successful post-CVRA case settlement and federal Voting Rights Act (VRA) compliance monitoring and redistricting process in San Mateo County. Co-Chair, Steering Committee, 2014 *Statewide Hearing*

*before the National Commission on Voting Rights*; Co-Chair, Statewide Legislative Advocacy Working Group to expand the scope of the CVRA; Chair, Statewide Working Group for the Voting Rights of Current and Formerly Incarcerated Californians, working with U.C. Berkeley Goldman School of Public Policy. Supervise law clerks and legal fellows in the development of legal research and writing. Featured speaker and panelist on voting rights at conferences/symposia for Stanford, U.C. Berkeley, U.C. Davis, U.C. Hastings Law Schools, the American Constitution Society, League of Women Voters, and informational briefings at the State Capitol.

Law Clerk, *Federal Public Defender, U.S. District Court for the Eastern District of California, Sacramento, CA*— Jan. 2012-Apr. 2012  
Conducted complex legal research and drafted internal legal memoranda for motions and briefs on behalf of indigent criminal defendants appearing before the U.S. District Court for the Eastern District of California, and in appeals to the U.S. Ninth Circuit.

Project Based Consultant/Law Clerk, *Center for Gender & Refugee Studies, University of California Hastings College of the Law, San Francisco, CA*— Sept. 2011-Nov. 2011  
Performed complex legal and country condition research for critical asylum cases, in addition to research, writing, and project support.

University of California Human Rights Fellow and Ella Baker Fellow, *Center for Constitutional Rights, Manhattan, New York, NY*—Jun. 2011-Aug. 2011  
Produced essential legal research memoranda and case briefs for pending domestic and international litigation on CCR's international human rights docket; edited and reviewed amicus brief to *petition for certiorari* from the U.S. Supreme Court to the Second Circuit Court of Appeals on the scope of the Alien Tort Statute; drafted and developed letter of complaint to U.N. Special Procedures Division, in collaboration with the European Center for Constitutional and Human Rights.

Law Clerk, *University of California, Davis Immigration Law Clinic/ California Rural Legal Assistance Foundation Partnership with the Mexican Consulate, Department of Protection & Legal Affairs, Davis/Sacramento, CA*—Aug. 2010-May 2011  
Produced critical legal research memoranda and developed case briefs for complex immigration asylum cases and deportation proceedings; developed substantial language for complex asylum case regarding ineffective assistance of counsel in *petition for certiorari* from the U.S. Supreme Court to the Ninth Circuit Court of Appeals. Provided general information and other direct pro bono immigration and naturalization legal services under attorney supervision for up to 10 clients a week as a representative of the Immigration Clinic at the Mexican Consulate in Sacramento, California.

Law Clerk, *Public Advocates, Inc., San Francisco, CA*—Aug. 2010-Nov. 2010  
Performed in-depth professional legal research and analysis; drafted confidential internal legal memoranda and drafted brief language for state and federal complex/class action civil rights and equal protection impact litigation in educational equity and reform. Completed client intakes and referrals; engaged in direct client interviews, case exploration and follow-up regarding California state *Williams* settlement violations.

King Hall Legal Foundation Public Interest Grantee and Pride Law Fund Fellow, *Center for HIV Law and Policy, Manhattan, New York, NY*—May 2010-Aug. 2010  
Provided overall strategic and technical program research, development, and management for the Summer 2010 Women's Advocacy Resource Connection (WARC) E-Forum, the *first* national electronic forum for HIV positive women, rights advocates and other stakeholders. Contributed to forthcoming legal primer on the 1998 Rehabilitation Act and 2008 ADA Amendments, addressing race, gender, human rights, and HIV-status discrimination in health care service settings.

## OTHER ACADEMIC RESEARCH EXPERIENCE

Research Assistant, *Dean Kevin R. Johnson, U.C. Davis School of Law* May 2010-May 2012  
Performed extensive legal research and analysis for July 2011 *University of Iowa Law Review* symposium article on strategies to increase diversity in legal education and practice in the post - *Grutter* and *Parents Involved* era. Reviewed and proofed textbook manuscript on U.S. Immigration Law, law review articles on Justice Sotomayor and Arizona State Law SB1070. Drafted complex legal research memoranda, and performed additional research for Dean Johnson's regular IMMIGRATIONPROF BLOG submissions.

Research Assistant, *Diane M. Amann, Director, California International Law Center (CILC) at U.C. Davis School of Law* -- Jan. 2011-Apr. 2011  
Edited and reviewed Spring 2011 *Brill International Criminal Law Review* articles and *Towards Peace with Justice in Darfur: A Framework for Accountability* (2011), produced in collaboration with the Robert F. Kennedy Center for Justice & Human Rights.

OTHER PROFESSIONAL EXPERIENCE

Program Manager/Coordinator, <i>The Women's Cancer Resource Center (WCRC)</i> , Oakland, CA	May 2007-Jul. 2009
Statewide Field Organizer, <i>The Education Trust—West (ETW)</i> , Washington, D.C./Oakland, CA	Aug. 2006-Mar. 2007
Labor & Community Organizer, <i>AFL-CIO, SEIU-Health Systems Division, SEIU-United Healthcare Workers-West</i> , Washington, D.C./Las Vegas, NV/Los Angeles/San Francisco/Oakland, CA	Aug. 2004-Jul. 2006